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1 2 3 4 5	FRED ALVAREZ (SBN 68115) ALLISON B. MOSER (SBN 223065) JONES DAY Silicon Valley Office 1755 Embarcadero Road Palo Alto, CA 94303 Telephone: 650-739-3939 Facsimile: 650-739-3900 falvarez@jonesday.com	EÒËZÇŠÒÖÁZÁ DID HE		
6 7	amoser@jonesday.com Attorneys for Defendants NEXGEN HEALTHCARE, INC. and ROMUA GERONIMO	ALDO		
8 9 10 11	UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA			
12 13	SAN JOS	SE DIVISION		
14 15 16 17 18 19 20 21	EVELYN EDRA, Plaintiff, v. NEXGEN HEALTHCARE, INC., THE TERRACES OF LOS GATOS, and ROMUALDO GERONIMO Defendants.	Civil Action No. CV13-0227 RMW JOINT STIPULATION AND [PROPOSED] ORDER TO CONTINUE ADR DEADLINE		
2.3 2.4 2.5 2.6 2.7				
28	SVI-127122v1	Joint Stipulation to Continue ADR Deadlin		
	U V 1 12/122V1	Civil Action No. CV13-0227 RMV		

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1	Pursuant to USDC Local Civil Rules 6-2 and 7-12, Plaintiff Evelyn Edra and Defendants	
2	NexGen Healthcare, Inc., Romualdo Geronimo and American Baptist Homes of the West, dba	
3	The Terraces of Los Gatos, ("the Parties") hereby stipulate and agree as follows:	
4	WHEREAS the Parties agreed to complete an Early Neutral Evaluation as a form of	
5	Alternative Dispute Resolution ("ADR") process;	
6	WHEREAS the Parties were ordered by the Court to complete an Early Neutral	
7	Evaluation by July 17, 2013;	
8	WHEREAS the Parties have an Early Neutral Evaluation scheduled for July 16, 2013,	
9	with briefs to be submitted by July 8, 2013;	
10	WHEREAS the Parties are currently actively engaged in settlement communications and	
11	would like to continue to pursue such negotiations without spending the time and resources to	
12	prepare for the currently scheduled July 16, 2013 Early Neutral Evaluation;	
13	WHEREAS the Parties are currently in the process of exchanging documents in order to	
14	assist in their settlement discussions; and	
15	WHEREAS the extension of the ADR deadline will not impact any other currently	
16	scheduled deadlines.	
17	NOW THEREFORE, the Parties, by and through their undersigned counsel, hereby	
18	stipulate and agree as follows:	
19	The Parties hereby jointly request that the Court postpone the Parties deadline for	
20	completing ADR/Early Neutral Evaluation for 45 days, from July 17, 2013 until August 31, 2013	
21	IT IS SO STIPULATED.	
22		
23	Dated: June <u>A5</u> , 2013 JONES DAY	
24		
25	Allison B. Moser	
26	Attorneys for Defendants	
27	NexGen Healthcare, Inc. and Romualdo Geronimo	
28		
- 11		

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1 2	Dated: June, 2013	VAN DERMYDEN ALLISON LAW CORPORATION
3		
4		By:Alexander M. Sperry
5		
6		Attorneys for Defendant American Baptist Homes of the West, dba The Terraces of Los Gatos
7		The Terraces of Bos Galos
8	Dated: June, 2013	ROBERT DAVID BAKER, INC.
9		
10		
11		By:Robert David Baker
12		Attorney for Plaintiff Evelyn Edra
13		· ·
14	PURSUANT TO STIPULATION, IT IS SO ORDERED.	
15		
16	Date:	
17		
18		
19		Honorable Ronald M. Whyte
20		United States District Judge
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26		
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28		
	SVI-127122v1	Joint Stipulation to Continue ADR Deadline

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1	Dated: June, 2013	VAN DERMYDEN ALLISON LAW CORPORATION
2		
3		By:Alexander M. Sperry
4		
5 6		Attorneys for Defendant American Baptist Homes of the West, dba The Terraces of Los Gatos
7	a 5	
8	Dated: June 25, 2013	ROBERT DAVID BAKER, INC.
9 10		\sim
11		By:
12		Robert David Baker
13		Attorney for Plaintiff Evelyn Edra
14	PURSUANT TO STIPULATION, I	T IC CO ODDEDED
15	roksoani io siirolation, i	I 15 50 ORDERED.
16	Date:	
17	Dute.	
18		
19		Honorable Ronald M. Whyte
20		United States District Judge
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28		
	SVI-127122v1	Joint Stipulation to Continue ADR Deadline
		- 3 - Civil Action No. CV13-0227 RMW

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1 2	Dated: June <u>24</u> , 2013	VAN DERMYDEN ALLISON LAW CORPORATION
3		MI KANIII
4		By: Alexander M. Sperry
5		Attorneys for Defendant
6		American Baptist Homes of the West, dba The Terraces of Los Gatos
7	D + 1 T	
8	Dated: June, 2013	ROBERT DAVID BAKER, INC.
9		
10		Rv∙
11		By:Robert David Baker
12		Attorney for Plaintiff Evelyn Edra
13		
14 15	PURSUANT TO STIPULATION, IT IS SO	ORDERED.
16	Ï D D Н Date:	
17	Date.	
18		Ronald M. Whyte
19		Honorable Ronald M. Whyte
20		United States District Judge
21		
22		
23		
24		
25		
26		
27 28		
20	SWI 1271221	Joint Stimulation to Continue ADR Deadline